

## Tania Hana

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**From:** Stacy Fulco  
**Sent:** Monday, February 15, 2021 8:44 AM  
**To:** 'Guy Geleerd'  
**Subject:** RE: Soula Liarakos v. Costco, 20 L 9971, Cook County

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Thank you Guy – I greatly appreciate the quick response and the information.



Stacy D. Fulco, Partner  
Bodell Bove LLC  
2215 York Road, Suite 515  
Oak Brook, IL 60523  
Direct: (630) 382-4804  
Phone: (630) 382-4800  
Facsimile: (630) 468-2158  
RETAIL & HOSPITALITY LAW BLOG: [stacyfulco.com](http://stacyfulco.com)

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**From:** Guy Geleerd <[guy.geleerd@gmail.com](mailto:guy.geleerd@gmail.com)>  
**Sent:** Monday, February 15, 2021 8:14 AM  
**To:** Stacy Fulco <[SFulco@bodellbove.com](mailto:SFulco@bodellbove.com)>  
**Subject:** Re: Soula Liarakos v. Costco, 20 L 9971, Cook County

Good morning and welcome aboard! Our client was 77 years old at time of fall at Costco in 2018. To date she has not had surgery following the fall. However, she experiences on-going, chronic pain to both knees and hips. Prior to the date of the incident, she had both knees replaced in 2004 and her left hip. She was making excellent recovery and was active prior to the Costco fall. After the fall she has chronic pain to both knees and both hips. She is currently under orthopedic care and follows up with her primary care physician. I would make an argument that the value of her case, despite her age is in excess of \$75,000.00. Therefore, if your removing to Federal Court - the economic amount may currently be less than the jurisdictional limit, but adding in the permanency takes the value north of the limits. I will look for your Notice of Removal. Thank you.

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Very truly yours,

**Guy D. Geleerd, Jr.**

EXHIBIT D



**GUY DELSON GELEERD JR. TRIAL LAWYER LLC**  
*Attorneys At Law*

**Top Fifty Jury Verdict 2017**  
**Recognized as an "Illinois Super Lawyer" and**  
**"Top Attorney in Illinois," Chicago Magazine.**

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On Mon, Feb 15, 2021 at 8:55 AM Stacy Fulco <[SFulco@bodellbove.com](mailto:SFulco@bodellbove.com)> wrote:

Guy -

We are counsel for Costco Wholesale Corporation and we will be representing Costco in this matter that was recently filed in Cook County by your office. I have not yet filed an appearance because we are assessing if this case can be removed to Federal Court, as our client is a Washington State Corporation.

I understand there was a prior attorney on this matter and he never provided much information to my client regarding the plaintiff's medical specials or injuries. Please advise if the plaintiff is asserting a case value over \$75,000. If not, please advise if you will sign a Stipulation that the case value is under \$75,000 which would allow the matter to remain in State Court.

As you know, we are under a time limitation for filing the removal so please provide us with this information as soon as possible. Thank you and I look forward to working with you on this matter.

Stacy



**Stacy D. Fulco, Partner**

Bodell Bove LLC

2215 York Road, Suite 515

Oak Brook, IL 60523

Direct: (630) 382-4804

Phone: (630) 382-4800

Facsimile: (630) 468-2158

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